

 THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Case 3:23-cv-00478 Document 206 Filed 02/13/25 Page 1 of 6 PageID #: 2426

from February 13, 2025, until seven days after the discovery conference, or, if the request for a discovery conference is denied, seven days after the entry of the Court's order ruling on this motion, and extend the Plaintiffs' optional reply deadline from February 20, 2025, until seven days from the date of Defendants' response. Plaintiffs and Defendant Lyell would show good cause for such an extension as follows:

1. The Court granted the Plaintiffs' emergency motion and quashed the deposition that was set for February 4, 2025. (Order, at 2, ECF No. 204.)

2. Under the Amended Case Management Order, discovery disputes are to be brought before the Court by request for a discovery conference after the parties have conferred in-person to resolve the discovery dispute. (Stipulated Am. Case Mgmt. Order at ¶ G, ECF No. 170.)

3. Counsel for Plaintiffs and Defendant Lyell have conferred in person and agree that the parties would benefit from a discovery conference concerning Plaintiffs' Motion for a Protective Order (ECF No. 200), specifically regarding whether the briefing on the motion may be filed under seal.

4. Plaintiffs and Defendant Lyell also anticipate filing a joint motion to seal the briefing on Plaintiffs' motion for protective order and intend to make a showing of good cause at the discovery conference.

5. The remaining defendants have advised that they do not oppose this motion.

For these reasons, Plaintiffs and Defendant Lyell request that the Court convene a discovery conference and further request that the Court extend Defendants' response deadline from February 13, 2025, until seven days after the Discovery Conference, or, if the request for a discovery conference is denied, seven days after entry of the Court's order ruling on this motion,

and extend the Plaintiffs' optional reply deadline from February 20, 2025, until seven days from the date of Defendants' response.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this the 12th day of February, 2025, the foregoing was served via the court's electronic filing system on the following counsel of record:

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